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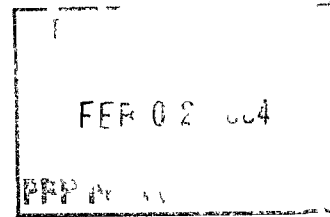
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Carlyn Winter Prisk (3HS21)
U S Environmental Protection Agency Region III
1650 Arch Street
Philadelphia PA 19103 2029



RE Lower Darby Creek Area Superfund Site

Dear Ms Prisk

Enclosed please find the response of Crown Cork & Seal Company Inc ("Crown ") to the supplemental information request served by the U S Environmental Protection Agency (EPA) in relation to the Lower Darby Creek Area Superfund Site (the Site)

Every effort was made in Crown s response to the EPA s initial information request with respect to the Site to provide all responsive information reasonably available to Crown As a result Crown has little additional information to add in response to the EPA s supplemental information request Nevertheless Crown has attempted in good faith to provide the requested information In the event that Crown discovers additional information rendering inaccurate its response to either the initial information request or the supplemental information request Crown will supplement its responses

Very truly yours

ARCHER & GREINER
A Professional Corporation

By Patrick M Flynn
Patrick M Flynn

PMF/bp

Encl

cc Brian Nishitani Esquire
Christopher R Gibson Esquire

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Enclosure F

Information Requested

- 1 In Crown Cork's response to Question 2 of EPA's November 5 2001 Information Request you describe the operations of Crown Cork's area facilities at two locations in the 1958 to 1976 time period as manufacturing multi piece cans suitable for use for food beverage or aerosol products In your response to Question 6 you state that the materials used to manufacture these cans included tin plate steel and inks for printing and that "oil was used as a lubricant in the machinery and a water based coolant was used during the manufacturing process "
- a Please describe in detail how scrap tin and steel and waste inks oil and coolant were handled and disposed between 1958 and 1976
 - b Identify all individuals employed at these facilities (including but not limited to any of the individuals identified in Crown Cork's response to Question 3) who may have knowledge about Crown Cork's waste disposal practices between 1958 and 1976 and
 - c Provide the current or last known address and telephone number for each of the individuals named in 1(b) above

RESPONSE

- a **Crown Cork & Seal no longer has records indicating how scrap tin and steel and waste inks, oil, and coolant were handled and disposed of between 1958 and 1976 Crown Cork & Seal's records retention policy with respect to waste disposal required that such records only be maintained for three years Moreover, Crown Cork & Seal's Philadelphia manufacturing facility, located at 9300 Aston Road, Philadelphia, Pennsylvania, closed in 1996 Upon information and belief, however, during the relevant time period waste inks, oil and coolant were consolidated in 55 gallon drums for off site disposal Crown Cork & Seal used Marvin Jonas for the disposal of drummed waste beginning in 1969 Upon information and belief, Jonas may have transported Crown Cork & Seal's drummed waste to the Kramer Landfill in Mantua Township, New Jersey, the GEMS Landfill in Gloucester Township, New Jersey, and the Buzby Landfill in Voorhees, New Jersey**
- b **Crown Cork & Seal objects to this request as vague, ambiguous, overly broad and unduly burdensome Subject to and without waiver of this objection, Crown Cork & Seal identified in its**

response to Question 3 of the EPA's November 5, 2001 Information Request those former employees that, to its knowledge, have provided deposition testimony regarding Crown Cork & Seal's operations during the relevant time period As further noted in that response, George Miller, who was Crown Cork & Seal's Director of Corporate Purchasing and participated in arranging for the disposal of Crown Cork & Seal's waste during at least a portion of the relevant time period, is deceased

c See Crown Cork & Seal's response to Question 3 of the EPA's November 5, 2001 Information Request

- 2 In Crown Cork's response to Question 7 it states that Marvin Jonas testified that he removed "wash water waste" from Crown Cork's facilities during a portion of the relevant time period
- a Please identify the stage in the manufacturing process at Crown Cork's facilities that generated such waste water and
 - b Identify the constituents of such waste

RESPONSE

- a **Crown Cork & Seal is not in a position to know what waste stream was in Marvin Jonas' mind when he testified that he removed "wash water waste" from Crown Cork & Seal's facilities Upon information and belief, however, a water-based compound was used as a coolant for machinery used to form aerosol can bodies**
- b **Crown Cork & Seal no longer has records indicating the constituents of any water-based coolant compound used during the relevant time period or the constituents of any waste disposed of during that time period**

- 3 In EPA's investigation regarding the Site employees of Tri County Hauling ("TCH") have recalled that waste from a Crown Cork facility in Philadelphia was disposed at the Folcroft Landfill (interview summaries attached) Please supplement Crown Cork's response to Questions 8, 9 and 10 of EPA's November 5 2001 Information Request with any additional information Crown Cork may be able to provide in this regard

RESPONSE

At this time, Crown Cork & Seal has no additional information to add to its responses to Questions 8, 9 and 10 of the EPA's November 5, 2001 Information Request Crown Cork & Seal reiterates that it has no information that any substance or material generated by Crown Cork & Seal ever was disposed of or treated at the Clearview Landfill, Folcroft

Landfill, Folcroft Landfill Annex, or any other portion of the Lower Darby Creek Area Superfund Site

- 4 In Crown Cork's response to Question 14, it states that upon information and belief waste from Rohm & Haas was disposed of by Marvin Jonas at the Folcroft Landfill Please identify the basis for this belief

RESPONSE

Crown Cork & Seal objects to this Request to the extent that it calls for Crown Cork & Seal to research and provide information regarding the potential nexuses to the Lower Darby Creek Area Superfund Site of other parties The EPA's request for information regarding Rohm & Haas Company's waste disposal practices should be addressed to Rohm & Haas Company, not Crown Cork & Seal

- 5 If any of the documents solicited in this and/or the November 5 2001 Information Request are no longer available please indicate the reason why they are no longer available If the records were destroyed please provide the following
- a Crown Cork's document retention policy during the relevant time period and currently
 - b A description of how the records were/are destroyed (burned archived trashed etc) and the approximate date of destruction
 - c A description of the type of information that would have been contained in the documents and
 - d the name job title, and most current address known to Crown Cork of the person(s) who would have produced these document the person(s) who would have been responsible for the retention of these documents and the person(s) who would have been responsible for the destruction of these documents

RESPONSE

- a **Crown Cork & Seal no longer has any records of what wastes were generated or disposed of by its Philadelphia area facilities during the period of 1958 through 1976 As indicated in response to Question 16 of the EPA's November 5, 2001 Information Request, upon information and belief, Crown Cork & Seal's document retention policy with regard to waste and waste disposal required retention of documents for three years during the relevant time period Upon information and belief, Crown Cork & Seal's document retention policy during the relevant time period was**

unwritten and, therefore, Crown Cork & Seal does not have a copy of the document retention policy in effect during the relevant time period

- b Crown Cork & Seal does not have any details regarding how, when or by whom records relating to waste or waste disposal were destroyed**
- c Unknown**
- d Unknown**

CERTIFICATION

I certify that the foregoing responses are true to the best of my knowledge information and belief and that I am authorized to execute this certification on behalf of Crown Cork & Seal Co Inc

I am aware that if any of the foregoing statements are willfully false I am subject to punishment

SIGNATURE
Name Michael J Bowley

Title Asst Secretary

NAME
Signature MICHAEL J BOWLEY

Date 1-26-04